
State Water Resources Control Board

April 2, 2025

Encarnacion Patlan
City of Orange Cove
633 6th Street
Orange Cove, CA 93646

CITY OF ORANGE COVE (WATER SYSTEM), INITIAL STUDY/MITIGATED
NEGATIVE DECLARATION (IS/MND) FOR THE CITY OF ORANGE COVE WATER
SYSTEM IMPROVEMENTS PROJECT: WELL SITE B (CITY OF ORANGE COVE, CA)
SITE PLAN REVIEW 2024-05 (PROJECT); STATE CLEARINGHOUSE #2025030382

Dear Encarnacion Patlan:

Thank you for the opportunity to review the IS/MND for the proposed Project. The State Water Resources Control Board, Division of Drinking Water (State Water Board, DDW) is responsible for issuing water supply permits pursuant to the Safe Drinking Water Act. This Project is within the jurisdiction of the State Water Board, DDW Fresno District. DDW Fresno District issues domestic water supply permit amendments to public water systems pursuant to Waterworks Standards (Title 22 California Code of Regulations [Cal Code Regs.] chapter 16 et. seq.). A public water system requires a water supply permit amendment when changes are made to a domestic water supply source, storage, or treatment and for the operation of new water system components- as specified in the Cal. Code Regs. § 64556.

The State Water Board, DDW, as a responsible agency under the California Environmental Quality Act (CEQA), has the following comments on the Water System's (IS/MND):

- The Water System will need to apply for a water supply permit amendment for addition of a new drinking water source (well) and operation of a new one-million-gallon storage reservoir. The Water System may also need to apply for a water supply permit amendment for the operation of a nitrate treatment system, as needed. Under Section 2.11 Other Public Agencies Whose Approval is Required (PDF page 19), please include “the State Water Resources Control Board, Division of Drinking Water.”
- The IS/MND states, “brine from the regeneration system would be drained into the storm drainage improvements that would be constructed. The storm drainage improvements would be tied to the city's storm drain infrastructure” (PDF page 69). However, the only onsite proposed stormwater improvements discussed in the

E. JOAQUIN ESQUIVEL, CHAIR | ERIC OPPENHEIMER, EXECUTIVE DIRECTOR

Project description (PDF page 15) is a stormwater basin. Improper disposal of potentially toxic brine waste could be a significant impact to water quality. The primary waste from strong base anion exchange consists of brine used to regenerate resin. An ionic material in the brine replaces the ionic material captured by the resin. Brine used to regenerate resin would contain high levels of potentially hazardous substances. As a potential generator of hazardous waste, the Water System shall comply with all applicable regulations in the California Code of Regulations, title 22, division 4.5, regarding the appropriate handling, management, and disposal of residuals. Please coordinate with the Fresno County, Department of Public Health, Certified Unified Program Agency regarding specific requirements for liquid waste. Please discuss how the waste residuals will be tested, handled, and properly disposed of in accordance with state laws.

- The Project area falls within the San Joaquin Valley-Kings Groundwater Basin area, a critically overdrafted and high priority basin according to the Department of Water Resources (Sustainable Groundwater Management Act Basin Prioritization Dashboard). The IS/MND indicates the well will be drawing water, not from the basin but from fractured granite seams where water is primarily stored within cracks and fractures in the rock (PDF page 70). Please provide a source for these statements.
- Discuss the amount of water that will be pumped annually; and explain if the unconfined fractured rock is connected to, or a part of, the San Joaquin Valley-Kings Basin.
 - If the fractured rock aquifer is connected to, or a part of, the San Joaquin Valley-Kings Basin, please discuss impacts on the critically overdrafted San Joaquin Valley-Kings Basin.

When the CEQA review process is completed, please forward the following items with the permit application to the State Water Board, DDW Fresno District Office at DWPDIST24@waterboards.ca.gov:

- The IS/MND and Mitigation Monitoring and Reporting Plan (MMRP);
- All comment letters received and the lead agency responses as appropriate;
- The Resolution or Board Minutes adopting the IS/MND and MMRP and approving the Project; and
- The date stamped Notice of Determination filed at the Fresno County Clerk's Office and the State Clearinghouse.

Please contact Lori Schmitz of the State Water Board at (916) 449-5285 or Lori.Schmitz@waterboards.ca.gov, for questions regarding this comment letter.

Sincerely,

Lori Schmitz
Environmental Scientist

Division of Financial Assistance
Special Project Review Unit
1001 I Street, 16th floor
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Cc:

State Clearinghouse

Sudarshan Poudyal
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